

Exhibit A

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

B.E. Technology, L.L.C.,

Plaintiff,

v.

**Sony Computer Entertainment America
LLC,**

Defendant.

Civil Action No. 2:12-cv-02826-JPM-tmp

**DECLARATION OF JENNIFER Y. LIU IN SUPPORT OF SONY COMPUTER
ENTERTAINMENT AMERICA LLC'S MOTION TO TRANSFER VENUE PURSUANT
TO 28 U.S.C. § 1404(A) TO THE U.S. DISTRICT COURT FOR THE NORTHERN
DISTRICT OF CALIFORNIA**

I, Jennifer Y. Liu, hereby declare under penalty of perjury that to the best of my knowledge the following statements are true and correct:

1. I am employed as Deputy General Counsel at Sony Computer Entertainment America LLC ("SCEA") in Foster City, California. I have been employed by SCEA since 2000. In this capacity, I have personal knowledge of the facts set forth.
2. SCEA is a limited liability company.
3. SCEA's headquarters is located at 919 East Hillsdale Boulevard, Foster City, California 94404. SCEA also has two other offices within the Northern District of California, located at 989 East Hillsdale Boulevard, Foster City, California 94404 and 950 Tower Lane,

Foster City, California 94404. SCEA has approximately 895 employees working in its Foster City offices.

4. SCEA does not have any offices or other facilities within the Western District of Tennessee.


5. I understand that Plaintiff B.E. Technology L.L.C. has filed the above-captioned patent infringement lawsuit against SCEA and eighteen other defendants in the United States District Court for the Western District of Tennessee. SCEA's accused products include the computer entertainment systems PlayStation 2 ("PS 2"), PlayStation 3 ("PS 3"), PlayStation Portable ("PSP") and PlayStation Vita ("PS Vita").

6. The potentially relevant U.S. documents and things related to the PS 2, PS 3, PSP, and PS Vita in SCEA's possession are located at its offices in Foster City, California.

7. To the extent that SCEA is required to produce any witness in connection with this litigation, all of SCEA's known prospective witnesses are located at or near its offices in Foster City, California, within the Northern District of California. In particular, SCEA's expected sales, finance, and marketing witnesses in connection with its accused products are John Koller, Vice President, Product Marketing and Aaron Wong, Senior Lead Accountant, both of whom work at SCEA's Foster City offices and live within the Northern District of California.

8. I am unaware of any potential SCEA witnesses who live in, work in or are otherwise based in Tennessee.

Executed on January 20, 2013.



Jennifer Y. Liu